## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CRYSTALLEX INTERNATIONAL CORP.,	)
Plaintiff,	)
v.	) Misc. No. 17-151-LPS
BOLIVARIAN REPUBLIC OF VENEZUELA,	)
Defendant.	)

## SPECIAL MASTER ROBERT B. PINCUS' MOTION AND PROPOSED ORDER GRANTING LIMITED EXEMPTION FROM THE STANDING ORDER REGARDING PERSONAL ELECTRONIC DEVICES

Special Master Robert B. Pincus ("Special Master") respectfully requests an exemption at the March 27, 2024 service of writs (*see* D.I. 1036) for his counsel, Alexander Welch, Luna Ngan Barrington, Chase A. Bentley, and Rebecca Jaeger ("Counsel") from the Court's Standing Order, effective May 15, 2023, titled *In re: Procedures Regarding the Possession and Use of Cameras and Personal Devices by Visitors to the J. Caleb Boggs Federal Building and United States* ("Standing Order"). Pursuant to paragraph 2 of the Standing Order, all cell phones and personal electronic devices are required to be off and placed in a locked pouch while visitors are in the courthouse. Paragraph 4 of the Standing Order exempts attorneys with a valid bar card.

Counsel are in good standing, with at least one State bar admission in the United States. However, Counsel do not meet the exemptions listed in Paragraph 4 of the Standing Order, as they do not have issued attorney bar identification cards. As such, the Special Master requests an exemption for Counsel from the Standing Order identical to attorneys that possess a valid bar identification card. Counsel will continue to be bound by Local Civil Rule 83.2 prohibiting photographs or broadcasting.

## POTTER ANDERSON & CORROON LLP

## OF COUNSEL:

Ray C. Schrock, P.C. (Admitted *pro hac vice*)
Alexander W. Welch (Admitted *pro hac vice*)
Chase A. Bentley (Admitted *pro hac vice*)
Luna Ngan Barrington (Admitted *pro hac vice*)
Sarah M. Sternlieb (Admitted *pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue

New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007 Ray.Schrock@weil.com Alexander.Welch@weil.com Chase.Bentley@weil.com Luna.Barrington@weil.com Sarah.Sternlieb@weil.com /s/ Myron T. Steele

Myron T. Steele (#00002) Matthew F. Davis (#4696) Bindu A. Palapura (#5370) Abraham Schneider (#6696) Hercules Plaza, 6<sup>th</sup> Floor

1313 North Market Street

P.O. Box 951

Wilmington, DE 19801
Telephone: (302) 984-6000
Facsimile: (302) 658-1192
msteele@potteranderson.com
mdavis@potteranderson.com
bpalapura@potteranderson.com
aschneider@potteranderson.com

Counsel for Special Master Robert B. Pincus

Dated: March 26, 2024 11402422 / 21202.00001

IT IS SO ORDERED this 26th day of March , 2024.

The Honorable Leonard P. Stark